

DECLARATION OF EVE SAMPLES

1. My name is Eve Samples and I serve as the Executive Director of the Friends of the Everglades, Inc. (“Friends”), a position I have held since early 2020. Prior to that time, I worked as a journalist covering Florida environmental issues.

2. Friends of the Everglades was founded in 1969 by the journalist, author, and environmental activist Marjory Stoneman Douglas. Friends is a 501(c)(3) nonprofit organization and is dedicated to preserving America’s Everglades and its interconnected ecosystems. The impetus for Marjory Stoneman Douglas founding Friends was a proposal in the late 1960s to build a jetport in the Everglades on the site that is now being developed as a detention facility for noncitizens. Friends worked to prevent the area, which is in the heart of the Big Cypress National Preserve, from being developed into a commercial airport.

3. The same exact site is now threatened again for development into a noncitizen detention center. State and Federal officials have dubbed the facility, which is under active construction, “Alligator Alcatraz.”

4. Big Cypress National Preserve is the nation’s first national preserve, spanning over 700,000 acres. It is a continuous freshwater ecosystem comprised of five habitats that are connected by the water that flows through them. The water flows from the hardwood hammocks to the pinelands, across the prairies, into the cypress swamps, and then into the estuaries that flow to the Gulf.

5. The freshwaters of Big Cypress are crucial to the health of the neighboring Everglades and the wildlife that inhabit it. Big Cypress provides habitat for various listed species and has the largest contiguous acreage of habitat for the endangered Florida panther in South Florida.

6. Because Big Cypress is a continuous ecosystem, any disruption to the flow of freshwater would lead to still or stagnant water upstream or downstream of the site, disrupting the surrounding natural environment on which species depend. Threat of pollution and degradation of water quality will harm surrounding wetland ecosystem and directly harm species.

7. Big Cypress National Preserve is a designated International Dark Sky Place based on outdoor lighting guidelines that specify where outdoor lighting is needed. The preserve achieved this designation in part because this protection is important for the Florida panther and other nocturnal species.

8. Friends is a member-based organization, and its members recreate, visit, fish and enjoy the nature, flora and fauna in the Big Cypress National Preserve including in the area of the proposed detention center. I personally have visited the site and I am familiar with the area.

9. Friends' members enjoy recreating in the Everglades and Big Cypress area, including in Panther habitat. They enjoy hiking, camping, kayaking, canoeing, birdwatching, and viewing and photographing nature and wildlife.

10. Since the proposal to build a detention facility in the Big Cypress National Preserve first surfaced, more than 18,000 supporters of Friends have voiced their opposition to the plan. This opposition springs from a desire to preserve and protect the Everglades, and the Big Cypress National Preserve specifically, including among Friends' members who use, fish, recreate, observe wildlife or otherwise enjoy the area.

11. I am aware that site on which the detention center is being built is in an area that serves as habitat for endangered and threatened species like the Florida panther, Florida bonneted bat, Everglades Snail kite, wood stork, and numerous other species. I have reviewed tracking data

collected by the U.S. Fish and Wildlife Service that has geolocated Florida panther on the site, a copy of which is attached hereto as Exhibit 1.

12. I personally visited the site on June 22, 2025, however gates leading into the property were locked, blocking public access. The following day, June 23, 2025, aerial and ground-level video footage confirmed substantial construction activities, including the placement of restroom facilities, detention tents, trailers, trucks, and the movement of heavy equipment on-site.

13. The ongoing construction of the detention center and the resulting structures and activities placed on the site will harm my aesthetic interests, and aesthetic interests of Friends' members who frequent the area. Particularly after dark when night sky conditions above the Everglades are spectacular, and appreciated in the serenity of the Everglades, the sound and artificial light from the detention center will degrade this experience.

14. The increased traffic in and out of the area to transport people, supplies, airport operations, and operations of the detention facility will harm both wildlife and Friends' members ability to enjoy that wildlife.

15. The planned use of the TNT Site includes the installation of prefabricated housing, water and sewage infrastructure, security fencing, and other temporary or semi-permanent structures, the construction and operation of which could impact water quality and flow both on and off site.

16. Construction on the detention center has already begun. Portable kitchens, restrooms, housing facilities, portable lighting, and other infrastructure have been positioned on site, and heavy vehicular traffic on and out of the site has occurred. On June 26, 2025, Friends

received reports of dump trucks carrying fill entering the Site. State officials have publicly stated that they expect to begin detaining people at the TNT Site by July 1, 2025.

17. In my capacity as Executive Director of Friends, I have directed the organization to request from state officials any environmental analyses or studies that have been done to evaluate resealable environmental impacts from the construction of detention center in the Big Cypress National Preserve. As I understand it, no such analyses or studies have been conducted whatsoever.

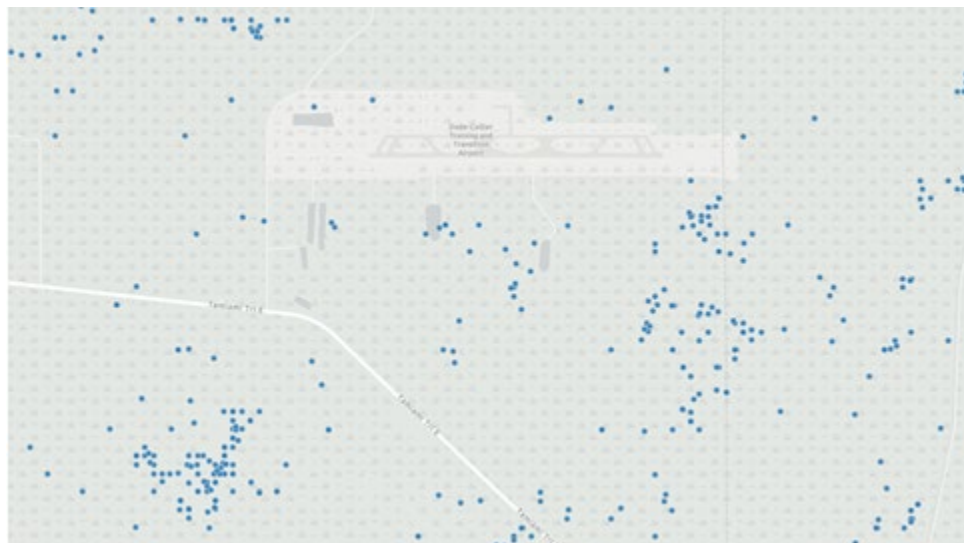
18. The only planning document I have been provided for the detention center is a “Waste Management Plan Overview,” a copy of which is attached, which states: “This plan if [sic] for the initial waste management of the temporary detention facility and will be expanded as site build out allows for more comprehensive permanent solutions to be implemented.” Ex. 2 at 1. The waste management plan contemplates that the detention center will generate biohazardous and infectious waste in connection with its operations. Beyond this, there has been no effort to evaluate the environmental impacts from the construction and operation of the detention camp.

19. Had the Department of Homeland Security, Immigration and Customs Enforcement and the Florida Division of Emergency Management prepared an Environmental Impact Statement (EIS) as required under the National Environmental Policy Act (NEPA), Friends and would have received notice and an opportunity to review the EIS and provide input as the law provides. Friends was denied this opportunity. Moreover, given the Site’s location within Big Cypress National Preserve and Everglades National Park, an EIS would have found that this Site is unsuitable for a detention center, and that better alternatives are available without harming sensitive environmental lands or endangered species.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 26, 2025.

A handwritten signature in black ink, appearing to read "Eve Samples", is positioned above a horizontal line.

Eve Samples



Source: <https://gis-fws.opendata.arcgis.com/datasets/fws::florida-panther-telemetry/explore?location=25.850665%2C-80.898916%2C13.00>



TDF Waste Management Plan Overview



Overview

This plan is for the initial waste management of the temporary detention facility and will be expanded as site build out allows for more comprehensive permanent solutions to be implemented. The goal of the Division and contracted vendors is to ensure a robust, proactive logistics and installation plan that fully eliminates the potential for environmental issues related to waste production, solid waste management, recycling, construction and demolition debris, and potable water management for all on-site restroom, shower, and laundry trailers by integrating high-capacity containment, secure plumbing, secondary spill containment, solid waste management, recycling, construction and demolition debris handling, and robust monitoring, this plan addresses and eliminates environmental risks, ensuring compliance and safe conditions for site occupants.

Monitoring, Evaluation and Compliance

On-site personnel will monitor biowaste and solid waste storage, potable water systems, dumpster, recycling, and C&D debris areas for leaks, spills, overflow, or contamination. Preventive maintenance schedules will be followed, including pump-outs of frac tanks and timely waste, recycling, and debris hauling. All procedures will comply with federal, state, and local environmental regulations.

Wastewater and Potable Water

Wastewater

Shower, restroom, and laundry units, as well as administrative and billeting trailers produce graywater, blackwater, and lint waste. Each waste-producing trailer will be hard-plumbed directly to designated 22,000-gallon frac tanks, reducing frequency of tank exchanges and minimizing transfer points. Frac tanks will be maintained at less than 50% of capacity. To secure connection points, all waste discharge lines will utilize 2-inch camlock connections. All connection points, hoses, and storage tanks will be within containment trays for spill protection. A trained team will inspect all plumbing and containment systems daily to maintain zero environmental impact.

Potable Water

Potable water will be delivered by 2,000-gallon and 6,000-gallon tanker trucks and transferred via secure plumbing to ensure safe transport and storage. To provide sealed connections, all potable water hookups will use 2-inch camlock fittings for a closed system. Water tanks will be sanitized, flushed, and water quality tested regularly.

Solid Waste

Appropriately sized roll-off dumpsters will be strategically placed throughout the site to handle all solid waste generated by operations and personnel. All dumpsters will be equipped with lids or tarps to prevent littering, wind dispersal, and animal intrusion. Dumpsters will be placed on stable ground with adequate clearance for truck access. A daily swap schedule for removal and replacement will be maintained to prevent overflow and ensure site cleanliness. Waste haulers will be responsible for safe transport and disposal at permitted facilities.

Recycling

Clearly marked recycling containers will be placed next to general waste dumpsters and throughout common areas to encourage source separation of recyclable materials. Materials such as cardboard, plastic, metal, and paper will be collected separately to reduce contamination and maximize recycling efficiency. A dedicated recycling hauler will collect and transport recyclable materials to an approved recycling facility on a routine schedule.

C&D Debris Management

Dedicated roll-off containers will be provided specifically for construction and demolition debris to avoid mixing with general waste and recyclables. Materials such as wood, metal, concrete, and drywall will be separated where practical to facilitate recycling and reuse opportunities. All C&D debris will be removed by licensed haulers and transported to permitted disposal or recycling facilities in compliance with local regulations.

Biowaste

Health and Medical vendor will ensure biohazard waste management involves proper containment, labeling, segregation, and disposal to prevent the spread of infection and environmental contamination. This includes using designated leak-proof, puncture-resistant containers, ensuring proper labeling with the biohazard symbol, and following specific disposal protocols for different types of biohazardous materials, such as sharps and liquid waste.

Containment

Biohazard waste will be placed in sturdy, leak-proof containers that are resistant to punctures. Sharps will be disposed of in designated sharps containers.

Labeling

All containers must be clearly labeled with the universal biohazard symbol and appropriate warnings, such as "Biohazardous Waste" or "Infectious Waste".

Segregation

Different types of biohazardous waste (e.g., sharps, liquid waste, pathological waste) will be segregated into separate containers to minimize risks and facilitate proper treatment.

Disposal

Biohazard waste from the site will be picked up by a certified and registered Biohazard disposal company and disposed of in accordance with Florida regulations.